

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE, TENNESSEE**

**IN RE: JOINT PETITION OF TEC)
COMPANIES AND THE CONSUMER)
ADVOCATE DIVISION FOR APPROVAL)
OF EARNINGS REVIEW SETTLEMENT)**

Docket No. ~~00-00995~~ 99-00995

ATTORNEY GENERAL'S MOTION FOR LEAVE TO FILE A REPLY BRIEF

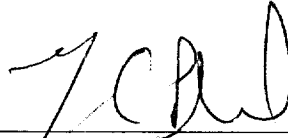
The Attorney General of the State of Tennessee, by and through the Consumer Advocate and Protection Division of the Office of the Attorney General and Reporter for the State of Tennessee ("Attorney General"), moves for leave to file a reply to the response of AT&T to the Attorney General's "Motion for Summary Judgment Dismissing AT&T's Complaint Against TEC's Proposed Rate Design Because AT&T's Proposed Design Is Not in the Public Interest Or, in the Alternative, for Transfer to the Access Charge Reform Docket."

As grounds, the Attorney General asks that the Tennessee Regulatory Authority ("Authority") take note of Authority Rule 1220-1-2-.06(1). The Authority's Practice and Procedure Rules, while not directly referencing the use of summary judgment motions, certainly allow for decisions on the merits in a contested case when presented as a written preliminary motion.

Further, the reply brief will assist the hearing officer in this matter in determining the merit of the Attorney General's original motion. The reply brief is submitted contemporaneously herewith.

PROD
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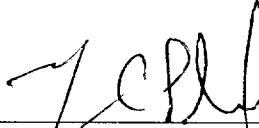
RESPECTFULLY SUBMITTED,

A handwritten signature in black ink, appearing to read 'T. Phillips', written over a horizontal line.

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CERTIFICATE OF SERVICE

The undersigned certifies that on January 19, 2001, an exact copy of the foregoing was mailed, via U.S. Mail, postage prepaid, to **Val Sanford, Esq.**, Gullett, Sanford, Robinson & Martin, PLLC, 230 Fourth Avenue North, 3rd Floor, P.O. Box 198888, Nashville, TN 37219-8888; and **T.G. Pappas, Esq. and R. Dale Grimes, Esq.**, Bass, Berry & Sims, 2700 First American Center, 313 Deaderick Street, Nashville, TN 37238-2700.



TIMOTHY C. PHILLIPS
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